Remarks

Reconsideration of the above-captioned application is respectfully requested. All pending claims (1-22) have been rejected on various substantive grounds, and objections to the drawings have been lodged, which are cured by the new drawings filed herewith and will not be further discussed. Claims 13-15 have been cancelled. Claims 1-12 and 16-22 remain pending.

Rejections Under 35 U.S.C. §102

Claims 1, 3, 7, 9-15, and 20-22 have been rejected under 35 U.S.C. §102 as being anticipated by Hirsch, and Claims 16, 18, and 19 have been rejected as being anticipated by Rasmussen et al.

Considering Hirsch first, contrary to the allegation that Hirsch, Figures 2-6 and col. 12, line 65 continuing to col. 13, line 48 teaches a property for indicating an SQL data type for a member as recited in independent Claims 1, 7, 11, 12, and 20, no such thing as an SQL data type property is taught or suggested in Hirsch. None of the object inspector properties shown in Figure 2 remotely resemble SQL data types, which is not surprising, given that Hirsch is directed to helping a user construct graphical scenes, not for sharing relational database types. Likewise, the property object shown in Figure 3 does not address SQL data types. Instead, it shows that the property object of Hirsch includes data pertaining to scene classes, methods for moving, scaling, and editing, object name and object type, a pointer to a linked list, a design-time value, and a parsed expression element, but nothing at all about SQL data type, col. 13, lines 1-48. Figures 4-6 appear to show logic flows for constructing a graphical scene, and nowhere in the description of these figures is the term SQL even mentioned, much less taught or suggested, with the exception that at col. 16, lines 10-14, the object model generation is disclosed to have a VcParameter 417 that represents an argument to a SQL

SELECT statement, something that does not seem to be even tangentially related to indicating an SQL data type for a member as claimed.

That leaves col. 13 of Hirsch, but as stated above, this portion of Hirsch, which describes Figure 3, does not mention SQL at all. For this reason, the claims rejected under this section on the basis of Hirsch are patentable.

Moreover, the same parts of Hirsch have been alleged to read on the claimed database-specific data type, but for the same reasons discussed previously, the rejection is incorrect in that nowhere does Hirsch teach or suggest a database-specific data type name. The object names in Hirsch do not appear to be database specific, and there is no need for them to be. Hirsch simply is not directed at the same problem as is the present invention (sharing relational database types and methods), but to an entirely different problem, namely, constructing a graphical scene from what evidently is a single database. There is thus no need and, hence, no suggestion in Hirsch to provide any name that is database specific, since only a single database appears to be used in Hirsch.

With particular focus on Claim 3, Hirsch, col. 19, lines 53-55 teaches a scene parameter default, not the claimed default value for a type of a member as recited in Claim 3.

Now considering the rejections of Claims 16, 18, and 19, Rasmussen et al., col. 5, lines 14 and 15 does not mention storing a first representation of metadata as alleged, much less storing it in the form of a set of objects and classes defined in a schema. This is because in the context of Claims 16, 18, and 19, the "first" representation is the pre-transformed representation, with the second representation being the transformed representation of metadata. To the extent that Rasmussen et al. can be said to transform a metadata representation (a position in which Applicant does not necessarily acquiesce), it is only the

transformed representation that is stored, not the pre-transformation representation as required by Claims 16, 18, and 19. Accordingly, the rejection is overcome.

Rejections Under 35 U.S.C. §103

Claim 2 has been rejected under 35 U.S.C. §103 as being unpatentable over Hirsch, Claims 4-6 have been rejected as being obvious over Hirsch in view of Goodwin et al., Claim 8 has been rejected as being obvious over Hirsch in view of Hotti et al., and Claim 17 has been rejected as being obvious over Rasmussen et al. in view of Goodwin et al. For reasons set forth above, the claims are neither taught nor suggested by the relied-upon references.

Furthermore, with particular respect to the rejection of Claim 2, as admitted by the examiner Hirsch does not teach the features of this claim but it has nevertheless been rejected on the ground that the features allegedly are "well known". Should the rejections be persisted in, a prior art showing of support for this allegation is requested under MPEP §2144.03.

The rationale for combining Goodwin et al. with Hirsch (to include JDBC in Hirsch to connect its database to an application program) lacks the requisite prior art suggestion to combine, in that nowhere does Hirsch suggest that its database required JDBC connectivity for any reason, much less the reason proferred in the rejection, and nowhere does Goodwin et al. suggest it has application with a scenery construction system like Hirsch's. Accordingly, the rejection is overcome.

Likewise, the rationale proferred to combined Hirsch with Hotti et al. (to use a database catalogue to promote database partitioning) lacks the requisite prior art suggestion. Nowhere does Hirsch suggest that

it requires database partitioning, much less using a catalogue, and nowhere does Hotti et al. suggest it has application with a scenery construction system like Hirsch's. Accordingly, the rejection is overcome.

Similarly, the rationale proferred to combined Rasmussen et al. with Goodwin et al. (to use UML in Rasmussen et al.) lacks the requisite prior art suggestion. Just because UML is or is not widely used does not constitute a prior art suggestion to modify Rasmussen et al. to use it unless the prior art suggests such a modification, which it does not. Accordingly, the rejection is overcome.

The Examiner is cordially invited to telephone the undersigned at (619) 338-8075 for any reason which would advance the instant application to allowance.

Respectfully submitted,

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